

Julie A. Vogelzang (SBN 174411)  
Edward M. Cramp (SBN 212490)  
Courtney L. Baird (SBN 234410)  
**DUANE MORRIS LLP**  
750 B Street, Suite 2900  
San Diego, CA 92101-4681  
Telephone: 619 744 2200  
Facsimile: 619 744 2201  
E-mail: jvogelzang@duanemorris.com  
ecramp@duanemorris.com  
clbaird@duanemorris.com

Attorneys for Defendants Von Curtis, Inc., P.M.  
Advanced Education Inc., Paul Mitchell Advanced  
Education LLC, PMNV Las Vegas, LLC, PMCA  
Bakersfield, LLC, PMHBW LLC, Winn  
Claybaugh, John Paul DeJoria, Paul Mantea,  
D'Ann Evans, and Ann-Marie Safadi

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

JESSICA MORALES, BERENISA CORTES  
PALOMINOS, DYLAN THOMAS, JANETTE  
BARRERA, and FRANCES HANDCOCK,  
Individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

VON CURTIS, INC., P.M. ADVANCED  
EDUCATION INC., PAUL MITCHELL  
ADVANCED EDUCATION LLC, WINN  
CLAYBAUGH, JOHN PAUL DEJORIA, JOHN  
PAUL MITCHELL SYSTEMS, PAUL MANTEA,  
D'ANN EVANS, ANN-MARIE SAFADI, PMNV  
LAS VEGAS, LLC, PMCA BAKERSFIELD, LLC,  
PMHBW LLC, and "John Does," name fictitious,  
name and number unknown, doing business as "Paul  
Mitchell The School,"

Defendants.

Case No.: 3:13-CV-04996-LB

**JOINT STIPULATION FOR  
ENLARGEMENT OF TIME TO  
RESPOND TO COMPLAINT AND TO  
RESCHEDULE CASE MANAGEMENT  
CONFERENCE; ~~PROPOSED~~ ORDER**

**[CIVIL L.R. 6-1(b)]**

1 Pursuant to Civil L.R. 6-1(b), Defendants Von Curtis, Inc., P.M. Advanced Education Inc.,  
2 Paul Mitchell Advanced Education LLC, PMNV Las Vegas, LLC, PMCA Bakersfield, LLC,  
3 PMHBW LLC, Winn Claybaugh, John Paul DeJoria, Paul Mantea, D'Ann Evans, and Ann-Marie  
4 Safadi ("Defendants"), and Plaintiffs Jessica Morales, Berenisa Cortes Palominos, Dylan Thomas,  
5 Janette Barrera, and Frances Handcock ("Plaintiffs"), by and through their undersigned counsel in  
6 the above-captioned matter, hereby stipulate as follows:

7 WHEREAS, Plaintiffs filed a Complaint against Defendants on or about October 25, 2013;

8 WHEREAS, on January 7, 2014, Plaintiffs requested that the Court reschedule the initial  
9 Case Management hearing then scheduled for January 30, 2014, because service of process had not  
10 yet been performed on any of the Defendants (Doc. No. 7);

11 WHEREAS, on January 9, 2014, the Court issued an "Order Rescheduling Hearing to March  
12 6, 2014 and Directing Service of Process," which reset the initial Case Management Conference date  
13 to March 6, 2014, at 11:00 a.m., and stated the "case management conference may be continued by  
14 stipulation thereafter." (Doc. No. 8);

15 WHEREAS, Plaintiffs served Defendant PMNV Las Vegas and purportedly served  
16 Defendant Ann-Marie Safadi on or about January 28, 2014, Defendant Paul Mitchell Advanced  
17 Education, LLC on or about January 29, 2014, and Defendants Winn Claybaugh and Von Curtis,  
18 Inc. on or about February 5, 2014;

19 WHEREAS, Defendants PMNV Las Vegas, and Ann-Marie Safadi, Paul Mitchell Advanced  
20 Education, LLC, Winn Claybaugh, and Von Curtis, Inc. agree to waive any objections to service,  
21 and counsel for Defendants P.M. Advanced Education Inc., PMCA Bakersfield, LLC, PMHBW  
22 LLC, John Paul DeJoria, Paul Mantea, and D'Ann Evans, agree to acknowledge service on behalf of  
23 Defendants PMCA Bakersfield, LLC, PMHBW LLC, John Paul DeJoria, Paul Mantea, and D'Ann  
24 Evans and to waive any objection to service, and in return, Plaintiffs agree to extend the time for  
25 Defendants Von Curtis, Inc., P.M. Advanced Education Inc., Paul Mitchell Advanced Education,  
26 LLC, PMNV Las Vegas, PMCA Bakersfield, LLC, PMHBW LLC, Winn Claybaugh, John Paul  
27 DeJoria, Paul Mantea, D'Ann Evans, and Ann-Marie Safadi to respond to the Complaint to and  
28 including April 8, 2014;

WHEREAS, Defendants do not waive any defenses or objections, other than service of the Complaint, by entering into this Stipulation;

WHEREAS, this Stipulation for Enlargement of Time for Defendants to file a responsive pleading affects the March 6, 2014 initial Case Management Conference date on the Court's calendar and other related deadlines. As such, the parties agree that the Case Management Conference should be rescheduled to May 8, 2014, at 11:00 a.m., subject to the Court's availability.

IT IS HEREBY STIPULATED by and between Plaintiffs, on the one hand, and Defendants, on the other, through their respective counsel of record, that Defendants Von Curtis, Inc., P.M. Advanced Education Inc., Paul Mitchell Advanced Education, LLC, PMNV Las Vegas, PMCA Bakersfield, LLC, PMHBW LLC, Winn Claybaugh, John Paul DeJoria, Paul Mantea, D'Ann Evans, and Ann-Marie Safadi have an extension of time to file a responsive pleading to the Complaint to and including April 8, 2014;

IT IS ALSO HEREBY STIPULATED that, subject to the Court's availability, the initial Case Management Conference in this matter currently set for March 6, 2014, at 11:00 a.m. be continued to a proposed date of May 8, 2014, at 11:00 a.m., and that the other deadlines set forth in the Court's Order Setting Initial Case Management Conference and Deadlines issued on October 25, 2013 (Doc. No. 4) be continued accordingly.

**IT IS SO STIPULATED.**

Dated: February 14, 2014

**DUANE MORRIS LLP**

By: *s/ Courtney L. Baird*

Julie A. Vogelzang  
Edward M. Cramp  
Courtney L. Baird  
Attorneys for Defendants VON CURTIS, INC.,  
P.M. ADVANCED EDUCATION INC., PAUL  
MITCHELL ADVANCED EDUCATION LLC,  
PMNV LAS VEGAS, LLC, PMCA  
BAKERSFIELD, LLC, PMHBW LLC, WINN  
CLAYBAUGH, JOHN PAUL DEJORIA, PAUL  
MANTEA, D'ANN EVANS, and ANN-MARIE  
SAFADI

1 Dated: February 13, 2014

**LAW OFFICE OF LEON GREENBERG**

2  
3 By: s/ Leon Greenberg

4 Leon Greenberg

5 Dana Sniegocki

6 Attorneys for Plaintiffs

JESSICA MORALES, BERENISA CORTES

PALOMINOS, DYLAN THOMAS, JANETTE

BARRERA, and FRANCES HANDCOCK

7  
8 ATTESTATION: Pursuant to Civil L.R. 5-1(i)(3), the filer attests that concurrence in the  
9 filing of this document has been obtained from each of the other signatories thereto.

10  
11 **ORDER**

12 The Court having considered the Joint Stipulation for Enlargement for Time to Respond to  
13 Complaint and To Reschedule Case Management Conference, orders as follow: the initial Case  
14 Management Conference set for March 6, 2014, at 11:00 a.m. shall be continued to **May 8, 2014**, at  
15 2:30 p.m. Defendants Von Curtis, Inc., P.M. Advanced Education Inc., Paul Mitchell Advanced  
16 Education, LLC, PMNV Las Vegas, PMCA Bakersfield, LLC, PMHBW LLC, Winn Claybaugh,  
17 John Paul DeJoria, Paul Mantea, D'Ann Evans, and Ann-Marie Safadi have up to and including  
18 April 8, 2014, to respond to the Complaint.

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20  
21 Dated: 2/19/2014

  
JUDGE, U.S. DISTRICT COURT